

IRELL & MANELLA LLP
Morgan Chu (70446)
mchu@irell.com
Jonathan S. Kagan (166039)
jkagan@irell.com
Jenifer Ellis (262806)
jellis@irell.com
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067-4276
Telephone: 310-277-1010
Facsimile: 310-203-7199

David C. McPhie (231520)
dmcphie@irell.com
Laura E. Evans (254547)
levans@irell.com
840 Newport Center Drive, Suite 400
Newport Beach, CA 92660-6324
Telephone: 949-760-0991
Facsimile: 949-760-5200

Attorneys for Plaintiff Juniper Networks, Inc.

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
Sara A. Poulos (admitted *pro hac vice*)
sapoulos@rkmc.com
Julia Dayton Klein (admitted *pro hac vice*)
jdklein@rkmc.com
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
Telephone: 612-349-8500
Facsimile: 612-339-4181

Attorneys for Defendants
Altitude Capital Partners, L.P. and Security
Research Holdings LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Juniper Networks, Inc.,

Plaintiff,

v.

Altitude Capital Partners, L.P., and
Security Research Holdings LLC,

Defendants.

CASE NO.: 3:09-cv-03449 JSW

**STIPULATION CONTINUING
DEFENDANTS' MOTION TO TAX COSTS
AND FEES AND ORDER THEREON**

Pursuant to N.D. Cal. Local Rule 7-12, Plaintiff Juniper Networks, Inc. ("Juniper") and Defendants Altitude Capital Partners, L.P. and Security Research Holdings LLC ("Defendants") (collectively, the "Parties") hereby enter into the following stipulation regarding briefing on Defendants' Motion for Costs and Fees (Dkt. No. 224) ("Motion"):

WHEREAS, on April 19, 2011, Judge White entered a judgment dismissing this case;

WHEREAS, on April 28, 2011, Juniper filed its notice of appeal to the Federal Circuit;

WHEREAS, on May 3, 2011, Defendants filed their Motion in which they requested (among other things) that the Court stay any further briefing on the Motion until after the completion of the appeal proceedings; and

WHEREAS, the Parties agree it would save judicial resources to postpone further briefing on this issue until the Federal Circuit has resolved the matters presented on appeal;

Accordingly, IT IS HEREBY STIPULATED AND AGREED between Juniper and the Defendants that, in the event that the Federal Circuit affirms the Court's judgment dismissing this case:

- (1) Defendants shall have 14 days after the Federal Circuit enters its judgment to file a Renewed Motion to Tax Costs and Fees (the "Renewed Motion");
- (2) Juniper's opposition to the Renewed Motion shall be due 28 days from the Federal Circuit's entry of judgment ; and
- (3) Defendants' reply shall be due 35 days from the Federal Circuit's entry of judgment.

1 DATED: May 13, 2011

Respectfully submitted,

2 IRELL & MANELLA LLP

3
4 By: /s/ Jenifer Ellis

Jenifer Ellis

5 Attorney for Plaintiff Juniper Networks, Inc.

6
7 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

8 By: /s/ Julia Dayton Klein


9 Julia Dayton Klein

10 Attorney for Defendants

11 Altitude Capital Partners, L.P. and Security Research
12 Holdings LLC

13
14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15
16 Dated: May 13, 2011

17 
18 HON. JEFFREY S. WHITE
United States District Court Judge